

FILED
Clerk
District Court

JUL 16 2008

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For The Northern Mariana Islands
By _____
(Deputy Clerk)

UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

KOICHI TANIGUCHI,) CIVIL ACTION NO. 08-0008
)
)
Plaintiff,)
)
vs.) PLAINTIFF'S
)
)
)
)
KAN PACIFIC SAIPAN, LTD.,) RESPONSE TO MOTION TO
dba Marianas Resort and Spa,) COMPEL PRODUCTION OF
)
)
Defendant.) DOCUMENTS
)
)

Plaintiff acknowledges that his response to defendant's request for production of documents was not timely served. Plaintiff has now served his response by e mail attachment to counsel for defendant.

The reason for the lack of timely response is due to communication and translation difficulties with plaintiff who is a citizen of Japan, resides in Japan and speaks and reads very little English. All documents must be translated English/Japanese and Japanese/English. Regrettably, this has taken more time than originally anticipated.

Defendant has commented upon what it contends are insufficient responses to interrogatories served. Plaintiff has replied to these comments and if further issues exist they will hopefully be able to be resolved without court assistance.

Dated this 15th day of July, 2008.

Respectfully Submitted,

DOUGLAS F. CUSHNIE
Attorney for Plaintiff

/s/

DOUGLAS F. CUSHNIE F1082